

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION**

In re:	§	
	§	CASE NO. 21-40195
Daniel Dagoberto Garcia	§	CHAPTER 13
Parker Edwin Bachmann	§	
Debtors	§	

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Carvana, LLC	§	CONTESTED MATTER
	§	
Respondent	§	
v.	§	
Daniel Dagoberto Garcia	§	
Parker Edwin Bachmann, Debtors	§	
Jonathan W. DeLoach, Trustee	§	
	§	
	§	

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**OBJECTION TO CONFIRMATION**

COMES NOW, Carvana, LLC (CARVANA) and makes and files its Objection to the Confirmation of the Debtor's Chapter 13 case for the reasons set forth below:

1.

CARVANA, holds a first priority lien on the Certificate of Title to the Debtor's 2016 Ford Explorer; VIN 1FM5K7B83GGD22009.

2.

The subject vehicle was purchased on 3/15/2021, which is within 910 days of the filing of the within case and should be paid in full pursuant to 11 U.S.C Section 1325(a)(9).

3.

The Debtor's plan estimates Carvana's claim in the amount of \$24,000.00 with interest rate at 4.00% adequate monthly payments in the amount of \$100.00, increasing to \$450.00.

4.

Carvana is entitled to have its claim in the amount of \$24,849.63 paid as fully secured. The contractual interest rate is 17.207%.

5.

The Debtor's proposed monthly payment and interest rate are insufficient to provide Carvana, with adequate protection.

THEREFORE, based upon the above and foregoing facts Carvana objects to the confirmation of the Debtor's Chapter 13 case.

This 11<sup>th</sup> day of May 2021

Respectfully Submitted

**/s/ Richard B. Maner**

Richard B. Maner, GA Bar No. 486588

Attorney for Respondent

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**CERTIFICATE OF SERVICE**

This is to certify that I have served a copy of **OBJECTION TO CONFIRMATION** electronically. Those not served electronically have been served by depositing same in the United States Mail in a properly addressed envelope to each with adequate postage thereon as follows:

Daniel Dagoberto Garcia  
147 Collins Drive  
Columbus, GA 31903

Parker Edwin Bachmann  
147 Collins Drive  
Columbus, GA 31903

Valerie G. Long  
Valerie G. Long, Attorney at Law  
3006 University Avenue  
Columbus, GA 31907

Jonathan W. DeLoach  
Office of The Chapter 13 Trustee  
P. O. Box 1907  
Columbus, GA 31902

This May 11, 2021

**/s/ Richard B. Maner**

Richard B. Maner, GA Bar No. 486588

Attorney for Respondent

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5/5/2021

ELT Printout without Account Information



Collateral Management Services  
9750 Goethe Road | Sacramento, CA 95827  
www.dealertrack.com

## Carvana LLC

### Lien and Title Information

#### Lienholder

ELT Lien ID 001101896845  
Lienholder CARVANA LLC  
Lienholder Address  
Lien Release Date

#### Vehicle and Titling Information

VIN	1FM5K7B83GGD22009	Issuance Date	4/28/2021
Title Number	770074213835962	Received Date	4/28/2021
Title State	GA	ELT/Paper	ELECTRONIC
Year	2016	Odometer Reading	
Make	FORD	Branding	
Model			
Owner 1	DANIEL DAGOBERTO GARCIA		
Owner 2			
Owner Address	147 COLLINS DR COLUMBUS, GA 319034103		

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